

STATE OF SOUTH CAROLINA

(Caption of Case)

In re:

Application of South Carolina Electric & Gas
Company to Establish a Distributed Energy Resource
Program

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

COVER SHEET

DOCKET
NUMBER: 2015 - 5 - E

(Please type or print)

Submitted by: Bonnie Loomis

SC Bar Number: 15928

Address: 1201 Main Street, Suite 1100

Telephone: 803-748-1242

Columbia, SC 29201

Fax: 803-748-1346

Other: 803-719-6202

Email: bonnie@thepalladiangroup.com

NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition☒ Request for item to be placed on Commission's Agenda expeditiously☐ Other:

INDUSTRY (Check one)	NATURE OF ACTION (Check all that apply)		
<input type="checkbox"/> Electric	<input type="checkbox"/> Affidavit	<input type="checkbox"/> Letter	<input type="checkbox"/> Request
<input type="checkbox"/> Electric/Gas	<input type="checkbox"/> Agreement	<input type="checkbox"/> Memorandum	<input type="checkbox"/> Request for Certification
<input type="checkbox"/> Electric/Telecommunications	<input type="checkbox"/> Answer	<input type="checkbox"/> Motion	<input type="checkbox"/> Request for Investigation
<input type="checkbox"/> Electric/Water	<input type="checkbox"/> Appellate Review	<input type="checkbox"/> Objection	<input type="checkbox"/> Resale Agreement
<input type="checkbox"/> Electric/Water/Telecom.	<input type="checkbox"/> Application	<input type="checkbox"/> Petition	<input type="checkbox"/> Resale Amendment
<input type="checkbox"/> Electric/Water/Sewer	<input type="checkbox"/> Brief	<input type="checkbox"/> Petition for Reconsideration	<input type="checkbox"/> Reservation Letter
<input type="checkbox"/> Gas	<input type="checkbox"/> Certificate	<input type="checkbox"/> Petition for Rulemaking	<input type="checkbox"/> Response
<input type="checkbox"/> Railroad	<input type="checkbox"/> Comments	<input type="checkbox"/> Petition for Rule to Show Cause	<input type="checkbox"/> Response to Discovery
<input type="checkbox"/> Sewer	<input type="checkbox"/> Complaint	<input checked="" type="checkbox"/> Petition to Intervene	<input type="checkbox"/> Return to Petition
<input type="checkbox"/> Telecommunications	<input type="checkbox"/> Consent Order	<input type="checkbox"/> Petition to Intervene Out of Time	<input type="checkbox"/> Stipulation
<input type="checkbox"/> Transportation	<input type="checkbox"/> Discovery	<input type="checkbox"/> Prefiled Testimony	<input type="checkbox"/> Subpoena
<input type="checkbox"/> Water	<input type="checkbox"/> Exhibit	<input type="checkbox"/> Promotion	<input type="checkbox"/> Tariff
<input type="checkbox"/> Water/Sewer	<input type="checkbox"/> Expedited Consideration	<input type="checkbox"/> Proposed Order	<input type="checkbox"/> Other: _____
<input type="checkbox"/> Administrative Matter	<input type="checkbox"/> Interconnection Agreement	<input type="checkbox"/> Protest	
<input type="checkbox"/> Other: _____	<input type="checkbox"/> Interconnection Amendment	<input type="checkbox"/> Publisher's Affidavit	
	<input type="checkbox"/> Late-Filed Exhibit	<input type="checkbox"/> Report	

Print Form

Reset Form

**BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA**

DOCKET NO. 2015-54-E

In re:)	
)	
)	PETITION TO INTERVENE
Application of South Carolina Electric & Gas)	OF THE
Company to Establish a Distributed Energy)	S.C. SOLAR BUSINSS ALLIANCE
Resource Program)	
)	

Pursuant to Public Service Commission Regulation 103-825 and other applicable provisions of the South Carolina Public Service Commission's ("Honorable Commission" and "Commission") Rules of Practice and Procedure, the South Carolina Solar Business Alliance, LLC ("SCSBA" or "Petitioner") hereby timely files this Petition to Intervene in the above-captioned proceeding. In support of this Petition, SCSBA respectfully shows unto this Honorable Commission the following:

- 1) SCSBA is a limited liability corporation ("LLC") organized October 21, 2009, pursuant to Chapter 44 of Title 33 of the South Carolina Code of Laws and, since that date, remaining in good standing with the South Carolina Secretary of State.
- 2) SCSBA's principal place of business is currently co-located with that of Sustainable Energy Solutions, LLC at 804 Meeting Street, Charleston, South Carolina, 29403 and mailing address is currently co-located with that of the Hannah Solar Government Services, LLC at 3297 Pacific Street, North Charleston, South Carolina, 29418.
- 3) Petitioner is represented in this proceeding by:

Bonnie Loomis
1201 Main Street, Suite 1100, Columbia, South Carolina 29201
Telephone: 803-719-6202
Email: bonnie@thepalladiangroup.com

4) SCSBA is organized for the purpose of promoting and advocating public policy positions supportive of solar power generation in South Carolina.

5) SCSBA is a manager-managed LLC whose current managers are the following individuals, all of whom conduct solar energy related business in South Carolina under the company names indicated:

- A) Paul Fleury (Sustainable Energy Solutions, LLC)
- B) Grant Reeves (TIG Sun Energy I and II, LLC),
- C) Andrew Streit (SolBright Renewable Energy, LLC),
- D) Don Zimmerman (Alder Energy Systems, LLC),
- E) Bruce Wood (Sunstore Solar, LLC), and
- F) Dave McNeil (Hannah Solar Government Services, LLC).

6) SCSBA's more than thirty (30) Trade Members include solar energy companies and professional service firms engaged in the business of solar energy generation in this state and across the nation. The majority of SCSBA's Trade Members are based in South Carolina. All of the SCSBA Managers' companies are based in South Carolina.

7) On behalf of these Trade Members' business interests and upon request of the South Carolina Office of Regulatory Staff ("ORS"), SCSBA past Board Chair Grant Reeves appeared before this Honorable Commission on April 16, 2014, for an Allowable Ex Parte Briefing to Discuss Solar Power Potential in South Carolina, including the impact on solar of, then, Senate Bill 1189 and, now, Act 236 of 2014 ("Act" or "the Act"). (See SCPSC Docket 2014-12-E)

8) On June 5, 2014, this Honorable Commission was petitioned by the ORS pursuant to Section 58-40-20(F)(4) of the Act to open a docket in compliance with the Act's requirement of a generic Commission proceeding "for the purposes of implementing the requirements of Chapter 40, Net Metering, with respect to the net energy metering rates,

tariffs, charges and credits of electrical utilities, and specifically to establish the methodology to set any necessary charges and credits." (See SCPSC Docket 2014-246-E)

9) Recognizing the broad implications of that proceeding, the General Assembly explicitly stated in the Act that "all interested parties shall be allowed to participate" and "propose methodologies" for setting net metering rates and credits in the generic proceeding. (See S.C. Code Section 58-40-20(F)(4))

10) On July 25, 2014, SCSBA petitioned this Honorable Commission to participate in Commission Docket 2014-246-E alleging that:

A) SCSBA had standing to intervene as an "interested party" pursuant to Section 58-40-20(F)(4),

B) SCSBA Trade Members had direct and material interests in the issues to be addressed and resolved by this Honorable Commission, and

C) SCSBA's interests could not be represented adequately by any other party.

11) In that Petition, SCSBA further alleged standing to intervene pursuant to the long-standing practice of this Honorable Commission to grant such Petitions when "it is in the public interest to grant the relief requested in the Petition so that the Commission may consider all of the relevant information in the instant proceeding" (See SCPSC Docket 84-10-C, Order No. 84-498, Page 2) and intervention of the Petitioning party will "aid us in developing a full record in this case" (See SCPSC Docket No. 95-835-C, Order No. 1999-20, Page 2) SCSBA additionally asserted that involvement of South Carolina's only solar trade alliance would unquestionably serve to promote the public interest, better allow this Honorable Commission to consider all of the relevant information and ensure the development of a full record in that Docket.

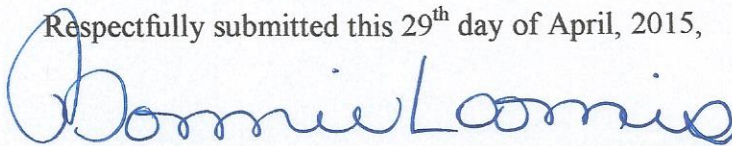
12) SCSBA's Petition in Docket 2014-246-E was not objected to by any Party or Intervenor (many of whom are the same as those involved in this proceeding, Docket 2015-54-E) and, on August 20, 2014, this Honorable Commission granted Intervenor status to SCSBA by approving the Petition.

13) SCSBA subsequently actively participated in the multi-party negotiations that resulted in the settlement proposed to, and later approved by and made an Order of, this Honorable Commission, in Docket 2014-246-E.

14) The SCSBA remains situated today as it was when this Honorable Commission favorably viewed the standing allegations made in Docket 2014-246-E, which are recited in Paragraphs 10 and 11 above. SCSBA, herein, re-states those standing allegations, specifically those in Paragraphs 10B, 10C and 11, and respectfully invokes this Honorable Commission's prior reasoning as the Commission gives consideration to this Petition to Intervene in Docket 2015-54-E.

WHEREFORE, Petitioner prays that this Honorable Commission grant SCSBA's Petition to Intervene in this docket and all related proceedings, including, but not limited to, the ability to appear as a party, engage in discovery, and participate in all hearings by offering testimony and exhibits and cross-examining the testimony and exhibits of other parties. Petitioners request the receipt of all notices, documents, exhibits and data submitted by all parties and the Commission's staff.

Respectfully submitted this 29th day of April, 2015,



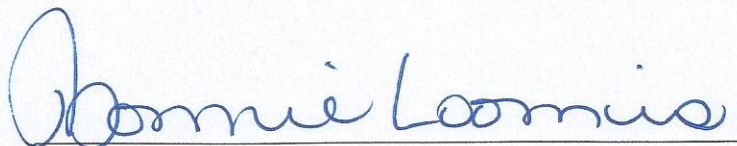
Bonnie Loomis (SC Bar #15982)
1201 Main Street, Suite 1100, Columbia, South Carolina 29201
Telephone: 803-719-6202
Email: bonnie@thepalladiangroup.com

**BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA**

DOCKET NO. 2015-54-E

In re:)	
)	
)	CERTIFICATE OF SERVICE
Application of South Carolina Electric & Gas)	
Company to Establish a Distributed Energy)	
Resource Program)	
)	

The undersigned certifies that she has, this 29th day of April, 2015, served a copy of the PETITION TO INTERVENE OF SC SOLAR BUSINESS ALLIANCE in the above-captioned matter on the Representatives of all Parties and all Intervenors in this Docket listed in the attached two (2) page "Service List for Docket 2015-54-E" accessed this date and printed from the South Carolina Public Service Commission online Docket Management System.



Bonnie Loomis (SC Bar #15982)
1201 Main Street, Suite 1100,
Columbia, South Carolina 29201
Telephone: 803-719-6202
Email: bonnie@thepalladiangroup.com

Service List For Docket 2015-54-E

Summary: Petition of South Carolina Electric & Gas Company for Approval to Participate in a Distributed Energy Resource Program

Industry: Electric

Opened: 2/10/15

Representatives

Scott Elliott , Counsel
Elliott & Elliott, P.A.
1508 Lady Street
Columbia, SC, 29201

Email: selliott@elliottlaw.us
Phone: 803-771-0555
Fax: 803-771-8010

Thadeus B. Culley , Counsel
Keyes, Fox & Wiedman LLP
401 Harrison Oaks Boulevard, Suite 100
Cary, NC, 27513

Email: tculley@kfwlaw.com
Phone: 510-314-8205
Fax: 510-225-3848

Joseph M. McCulloch Jr. , Counsel
Law Offices of Joseph M. McCulloch, Jr.
1426 Richland Street
Columbia, SC, 29211

Email: joe@mccullochlaw.com
Phone: 803-779-0005
Fax: 803-779-0666

Andrew M. Bateman , Counsel
Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, SC, 29201

Email: abateman@regstaff.sc.gov
Phone: 803-737-8440
Fax: 803-737-0895

Shannon Bowyer Hudson , Counsel
Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, SC, 29201

Email: shudson@regstaff.sc.gov
Phone: 803-737-0800
Fax: 803-737-0895

Robert Guild , Counsel
Robert Guild - Attorney at Law
314 Pall Mall Street
Columbia, SC, 29201

Email: bguild@mindspring.com

Phone: 803-252-1419
Fax: 803-252-1419

K. Chad Burgess , Associate General Counsel
South Carolina Electric & Gas Company
220 Operation Way - MC C222
Cayce, SC, 29033-3701

Email: chad.burgess@scana.com
Phone: 803-217-8141
Fax: 803-217-7810

Matthew W. Gissendanner , Senior Counsel
South Carolina Electric & Gas Company/SCANA Corporation
220 Operation Way - MC C222
Cayce, SC, 29033-3701

Email: matthew.gissendanner@scana.com
Phone: 803-217-5359
Fax: 803-217-7931

Derrick Price Williamson , Counsel
Spilman Thomas & Battle, PLLC
1100 Bent Creek Blvd., Suite 101
Mechanicsburg, PA, 17050

Email: dwilliamson@spilmanlaw.com
Phone: 717-795-2740
Fax: 717-795-2743

Stephanie U. Roberts , Counsel
Spilman Thomas & Battle, PLLC
110 Oakwood Drive, Suite 500
Winston-Salem, NC, 27103

Email: sroberts@spilmanlaw.com
Phone: 336-631-1062
Fax: 336-725-4476

Belton T. Zeigler , Counsel
Womble Carlyle Sandridge & Rice, LLP
1727 Hampton Street
Columbia, SC, 29201

Email: belton.zeigler@wcsr.com
Phone: 803-454-7720